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10 UNITED STATES DISTRICT COURT  
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
12

13 AMERICAN CIVIL LIBERTIES  
UNION FOUNDATION OF  
14 SOUTHERN CALIFORNIA,

15 Plaintiff,

16 v.

17 UNITED STATES IMMIGRATION  
AND CUSTOMS ENFORCEMENT,  
18 UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY,  
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20 Defendants.  
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Case No. 2:22-cv-04760 SHK

**STIPULATION CONTINUING  
DISPOSITIVE MOTION SCHEDULE**

IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, that the following proposed dates shall govern in this action, for the reasons set forth herein:

Matter	Current Date	Proposed Date
Defendants' Production of <i>Vaughn</i> Indices	N/A	8/10/23
Defendants' Motion for Summary Judgment	6/6/23	9/5/23
Plaintiff's Opposition and Cross-Motion Due	6/20/23	9/19/23
Defendants' Opposition to Cross-Motion and Reply Due	7/5/23	10/3/23
Plaintiff's Sur-Reply Due	7/18/23	10/17/23

On May 12, 2023, Assistant United States Attorney Jason Axe took over the defense of this action after the previously assigned AUSA, Joseph Tursi, was called to military leave, necessitating his extended absence from the office. Counsel for the parties conducted a conference call on May 12th to discuss the outstanding issues related to the FOIA requests, and since that date, they have continued in communication via email and during another conference call on May 18, 2023. Through those communications, the parties have worked together to, among other things, try to clarify search terms for remaining requests, what additional searches Defendants shall undertake, by what date Defendants shall resume producing responsive documents, and the pace of Defendants' monthly production. The additional time requested would allow for the parties to continue their efforts to resolve issues related to the search for records and address issues related to any records withheld in full or part.

Therefore, the parties respectfully request that the Court continue the dates as set forth above for the reasons set forth herein.

Respectfully submitted,

Dated: May 31, 2023

HOQ LAW APC

/s/ Laboni A. Hoq\*

LABONI A. HOQ  
Attorneys for Plaintiff

Dated: May 31, 2023

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\*Pursuant to Local Rule 5-4.3.4(2)(i), the filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.